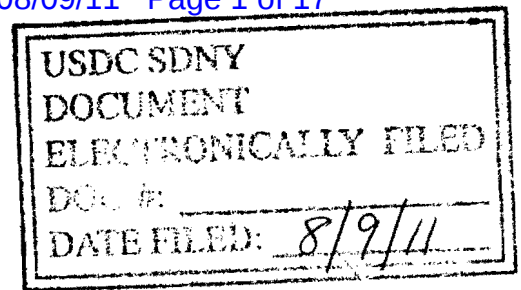


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,



10 Cr. 918 (RPP)

- against -

ORDER

ARON CHERVIN, et al.

Defendant.
-----X

ROBERT P. PATTERSON, JR., U.S.D.J.

Frederick Cohn is authorized to retain the services of AccessData Group, LLC under the terms and conditions set forth in the attached proposal dated July 31, 2011. Mr. Cohn's client as well as all other CJA clients in the action will share the costs of these services equally. Should any client with privately retained counsel wish to share in these services, they may do so upon payment of their pro rata share. In the event that clients with privately retained counsel believe they have insufficient funds to pay their pro rata share, a motion should be made to allow access to the materials at CJA expense. Such motion should include a financial affidavit (CJA Form 23) as well as description of counsel's fee arrangements.

IT IS SO ORDERED.

Dated: New York, New York
August 9, 2011

Robert P. Patterson, Jr.
U.S.D.J.

Copies of this Order sent to:

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fcohn@frederickhcohn.com

August 8, 2011

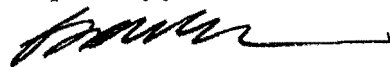
Honorable Robert P. Patterson
Daniel Patrick Moynihan USC
500 Pearl Street, Room 2550
New York, NY 10007-1312

Re: United States v. Chervin et al
10 CR 918(RPP)

Dear Judge Patterson:

Enclosed is the pricing proposal from AccessData. The prices are listed on the last page.

Respectfully yours,



Frederick H. Cohn

cc: all defense counsel
Jerry Tritz

FREDERICK H. COHN

ATTORNEY AT LAW

111 BROADWAY

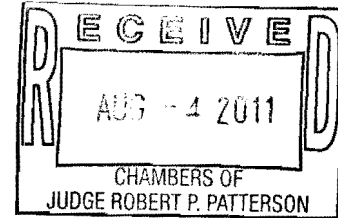
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August 4, 2011

BY FACSIMILE (212) 805 7917

Hon. Robert P. Jr. Patterson
Daniel Patrick Moynihan USC
500 Pearl Street, Room 2550
New York, New York 10007

**Re: U.S. v. Vadim Chervin, et al.,
Docket No.: 10 Cr. 0918(RPP)**

Dear Judge Patterson:

I am advised that the program can be up and running approximately two weeks from the date of the authorization of the funds. Training can occur as the installation progresses. Use of the program is possible during the installation process and all data should be in the system two weeks thereafter.

I hope this information is helpful.

Respectfully yours,



Frederick H. Cohn

cc: all defense counsel (by email)
William Harrington, AUSA (by email)



July 31, 2011

Frederick H. Cohn
111 Broadway
Suite 1805
New York, NY 10006

Dear Mr. Cohn,

RE: United States v. Chervin Processing & Hosting Proposal

As requested, we performed an initial analysis of the case data for U.S. v. Chervin.

The original drives contained 4.68 Terabytes (4792.32 GBs) of data. After removing system files (de-nisting) and de-duping within each custodian, 1.22 Terabytes (1253 GBs) remained.

Due to the mere volume of the data, I have apportioned discounts to the pricing, as well as some additional options to reduce the hosting charges.

Please let me know if you have any questions or concerns.

Best,

Brooke

Brooke Oppenheimer, Esq.
Federal Legal Advisor
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M: 703-244-1781
boppenheimer@accessdata.com
Licensed in New York

July 31, 2011
Page 1 of 9

AccessData Group LLC
U.S. v. Chervin

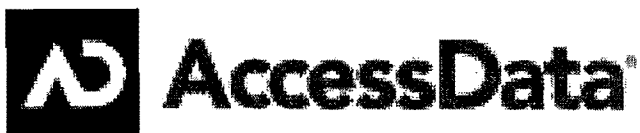


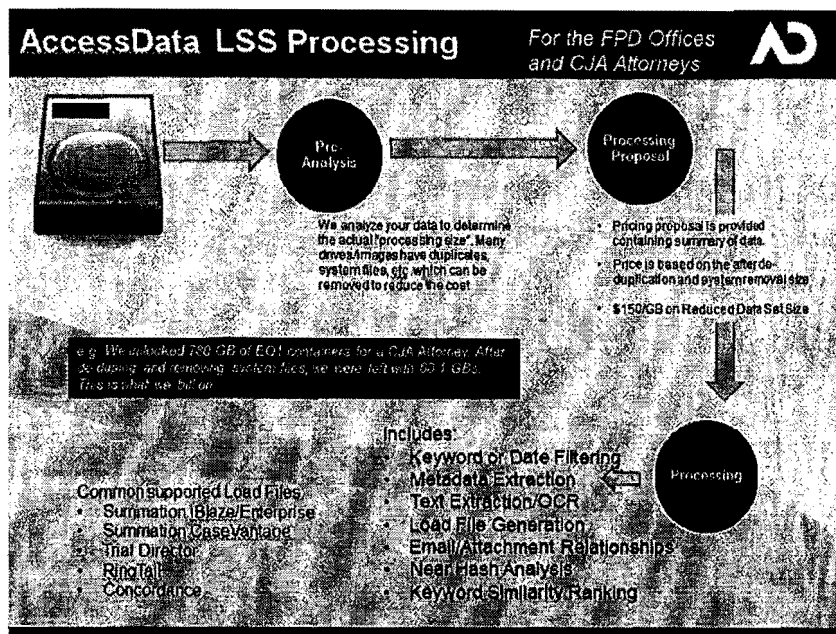
Table of Contents

Processing Procedure	3
Standard Processing Procedure.....	3
Summary of our Processing Services:	3
Market Summary of Processing Services:	3
Summary of Our CaseVantage Hosted Solution	4
Company Background.....	4
CaseVantage Capabilities.....	4
Secure & Reliable Access.....	4
Scalability, Stability, and Speed	5
Simplicity – Ease of Use.....	5
Customer Focused Project Management	5
Technical Support	6
CaseVantage Screenshots	7
Summary of U.S. v. Chervin Data Set	9
Processing Pricing & Discounts.....	9
Hosting Pricing & Discounts	9
Tips and Tricks to Reduce Hosting Costs.....	9

This proposal contains information proprietary and confidential to AccessData Group LLC and Frederick Cohn for U.S. v. Chervin. This document and related information are, therefore, not to be reproduced, transmitted, disclosed, or used in whole or in part, without the written consent of the parties. The pricing outlined in the proposal is effective for 180 days.



Processing Procedure



Standard Processing Procedure

<p>Native Processing</p>	<ul style="list-style-type: none"> * Keyword & Date Filtering * Metadata Extraction * Text Extraction/OCR * Load File Generation * Near Hash Analysis * Keyword Similarity Ranking
---------------------------------	--

*Size based on the reduced size after the removal of system files and duplicates.

Summary of our Processing Services: You pay per GB on the output size. In order to determine the output size, we will do a pre-analysis of your data in order to determine size of actual content (after removing system files and duplicates). You then determine if it is affordable. Upon approval, we process and export with any standard industry load file (i.e. Summation, Concordance, Ringtail, etc.).

Market Summary of Processing Services: Most of the market is currently doing and "per GB in" charge or a "per GB in per GB out" charge. What both of these mean is that you are paying for the system files and duplicates.



Summary of Our CaseVantage Hosted Solution

You can depend on CaseVantage whether you have a massive project to harvest, review, and produce – as native files and email, or if you are a participant in a multi-party litigation requiring distinct access for each party involved.

Company Background

For over 20 years, AD Summation has been dedicated to providing solutions for legal professionals to gain the advantage in their cases by leveraging technology.

CaseVantage Capabilities

To better comprehend the CaseVantage solution, read through the following sections which detail the services as well as the features and benefits of the hosting platform.

Secure & Reliable Access

Once you give your material to CaseVantage it is safe and secure. This applies to physical data, it's transmission to you via the Internet, and the roles and rights assigned to each person accessing your CaseVantage case.

CaseVantage hosting facility is a fault-tolerant, highly secure facility, enabling CaseVantage to further protect its data resources. It utilizes best-of breed providers in all components of its infrastructure and employs at least N+1 redundant configuration strategies in all power and network components. Through the state-of-the-art, fault-tolerant data center, CaseVantage can offer 24 X 365 world-class support with the technology needed to scale complex environments in a timely, secure and cost-effective manner.

When you log in to CaseVantage, your session is encrypted using Secure Sockets Layer (SSL). This industry-standard technology encrypts data that passes between you and our server. Packet sniffers can't decode it, hackers can't read it, and your privacy is assured.

CaseVantage allows for specific permissions by individual user, document, and even subjective attorney issue and categorization coding and notes. Permissions can be set to allow specific access cases, collections of documents, eMail, eDocs, and transcripts, as well as CaseVantage functionality and features. This allows you to designate "power" or "case manager" type roles within your team.

CaseVantage can set up multiple subsets or collections of documents, eMail, eDocs, and transcripts and only allow specified users and or group access. The option to host separate



collections offers the ability to share access to disparate sets of data while protecting sets of data containing privileged documents.

Scalability, Stability, and Speed

In addition to the peace of mind that your data is safe, you can depend on CaseVantage to perform reliably and quickly, anytime, anywhere, no matter the size and scope of your repository.

Built on a foundation of Microsoft SQL, your CaseVantage database can grow by gigabytes and terabytes without undermining performance or availability.

What's more, our hosting platform has been built to transition from document-to-document (native or TIFF-based) at the fastest possible pace.

Simplicity – Ease of Use

One of the key strengths of CaseVantage is the simplicity of its presentation. Using CaseVantage is straightforward, intuitive, and uncomplicated. You can add reviewers to your team without investing in hours of training and lost revenue.

The simple and easy to use interface offers large views onto the native file and email. It also includes a tagging palette for attorney coding to facilitate quick attorney coding for responsiveness, privilege, and any of the legal issues, or any other criteria. You can further perform integrated Boolean searching across all hosted materials or pull out indices with a minimum of “clicks” and effort.

Workflow tools such as automatic allocation of document sets, foldering, and saved searches (personal and shared) allow you to parse out and organize your review in an organic and flexible manner. Rather than learning and deciphering yet another program, you are freed to focus on the content of your case.

Customized activity reports allow you to monitor and measure the progress of your team as well as authenticate the quality and pace of your review. You can review that information within CaseVantage or download it or send it immediately off via email.

There is no software installation or hardware to maintain and support. You can access CaseVantage using Internet Explorer along with any Internet connection. The non-recoverable costs of owning and maintaining ESI processing tools and review software can add up exponentially. CaseVantage turns that into a comprehensible monthly service fee.

Customer Focused Project Management

Our project management and operations team comes to us from the best talent at major firms and litigation technology companies. They understand the need to operate at “attorney-speed.”



Each client is given a dedicated project manager to guide your company from engagement through all stages and decisions associated with using CaseVantage. Communication is frequent and fully aware of the context of your case.

Technical Support

Our Technical Support Team is available 24/7 to help you with functionality and computer support related to your hosted review.

We are responsible for loading data and providing 24/7 support. Therefore, all your team does is concentrate on the review.

Summary

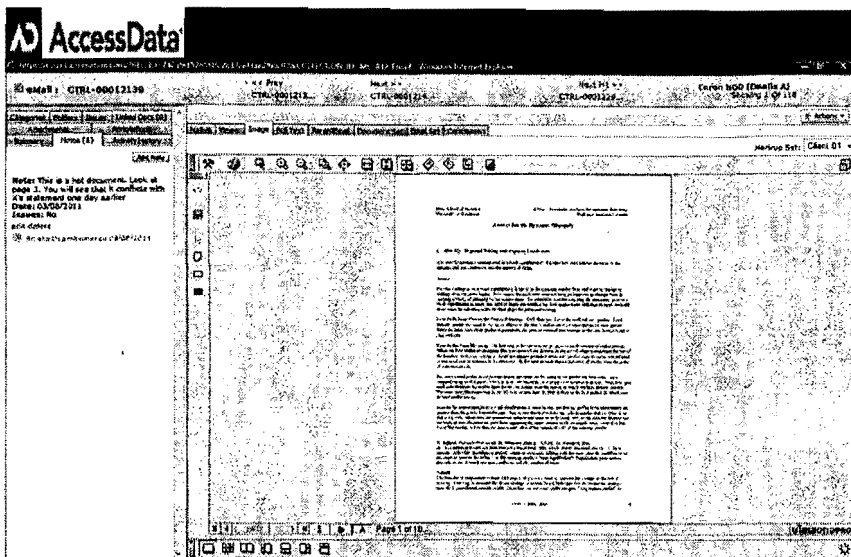
AccessData Group CaseVantage Legal Services is that solution and has the lineage and features and usability your company needs to get back to the fundamental tasks of collection, review, and production.

The screenshot displays the Microsoft Access 2000 application window. The title bar reads "Microsoft Access - Table1.mdb". The menu bar includes File, Edit, View, Format, Tools, Window, and Help. The toolbar contains icons for opening, saving, printing, and other standard database operations. The main window is divided into a left-hand pane showing the database structure (Tables, Queries, Forms, Reports, Pages, Macros, Modules) and a right-hand pane showing the data in a grid view. The grid view displays the following data:

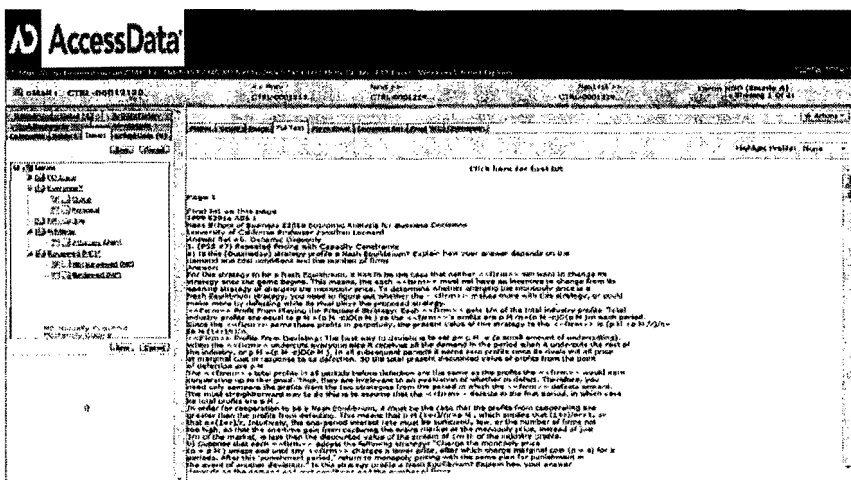
Order Number	From	To	Resource Code	Date
1
2
3
4
5
6
7
8
9
10

The status bar at the bottom indicates "Table1: Design View" and "Page 1 of 1000".

AccessData Group LLC
U.S. v. Chervin



The notes feature allows you to place searchable notes on the documents. These can be left personal, assigned to a group, or exposed to everyone in the case.



This view shows the tagging functionality. Once you create your issues, all you have to do is check the box and move to the next document. This allows you to sort facts, tag to issues, etc. You can easily move from hit to hit. In the example above, you will notice that the folders have different colors. If the folder is black, then it is shared with everyone in the case. If it is red, it is shared with the group you assigned it to. If it is blue, it is a personal folder that only you can see. To tag the document to a folder, all you do is check the box and move to the next document. When running a search, the search terms will be highlighted in the text of the document.



Summary of U.S. v. Chervin Data Set

From the multiple of hard drives received, there was a total of 4.68 Terabytes of data.

After removing system files and duplicates (within custodians), 1.22 Terabytes remain. This consists of unique user created files.

Therefore, the data (and billable size) reduced 73.85%.

Pricing Summary

1. Processing

Service	Original Quantity	Quantity After Denisting	List Price	Discount (20%)	Total
Processing	4792 GBs	1253 GBs	\$150	\$120	\$150,360

** Total reached by 1253 GBs x \$120 = \$150,360

2. Hosting Charges

Monthly Charges	Line Item	List Price	Discount %	Discount Price	GBs	Total Price
	Per GB	\$50/GB	40%	\$25/GB	1253	\$31,325
	Per User	\$25/User	50%	WAIVED*	25	\$0

*Maximum of Free Users is 30. Then will require a \$10 per user charge

Loading Charges	\$0/Included
Technical Support 24/7/365	\$0/Included
Training	\$0/Included
Dedicated Project Management	\$0/Included

TIPS TO REDUCE HOSTING COST

- 1. KEYWORD/DATE FILTERING DURING PROCESSING:** If you know of specific key words or dates you are concerned with, we can run these searches at the processing stage. This will reduce the data that enters the hosted platform. This option is included in your processing charges.
- 2. CONTINUOUS REMOVAL OF DATA:** As data is reviewed and determined to be irrelevant or useless, it can be removed from the review platform so as to prevent the accrual of monthly charges. (Copies of this data can be maintained just in case). This can substantially reduce the size of your data.

Your Project Management can assist you in running searches at no additional cost.